

# Important: When filling out forms on the computer, use only the tab key to move your cursor do not use the return key.





# Massachusetts Department of Environmental Protection

Bureau of Waste Prevention - Air Quality

A. Facility Information

# **CPA-PROCESS** (BWP AQ 02 Non-Major, BWP AQ 03 Major) Comprehensive Plan Application for Process Emission Unit(s)

Type of Application: ☐ BWP AQ 02 Non-Major CPA ☐ BWP AQ 03 Major CPA

For Process Equipment Emitting 10 Tons or More of an Air Contaminant per Consecutive 12-Month Time Period.

Transmittal Number	_
Facility ID (if known)	_

1.	Facility Name					
2.	Street Address					
				MA		
3.	City			4. State		5. ZIP Code
6.	MassDEP Account #	/ FMF Facility # (if Knowi	n)	7. Facility AQ # /	SEIS ID # (if	Known)
8.	Standard Industrial C	classification (SIC) Code		9. North American	Industry Class	sification System (NAICS) Code
10.	Are you proposing	a new facility?		☐ Yes ☐ No -	If Yes, skip	to Section B.
11.	Certifications and a	ir Quality Plan Approva associated facility-wide ting Permit for this faci	emission of	caps, if any, for th	is facility in	CMR 7.26 Compliance the table below. If you
			Table '			
25	roval Number(s)/ % or 50% Rule/ IR 7.26 Certification	Transmittal Number(s) (if Applicable)	(e.g. C	Air Contaminant CO, CO2, NOx, SO2 , PM or Other [Spec		Existing Facility-Wide Emission Cap(s) Per Consecutive 12-Month Time Period (Tons)
		$CO_2$ = carbom dioxide, NO dous air pollutant, PM = p				OC = volatile organic
12.	Will this proposed pro	ocess result in an increas	se in any fac	lity-wide emission o	ap(s)?	Yes* ☐ No
	*If Yes, describe:					



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Comprehensive Plan Application for Process Emission Unit(s)
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Facility ID (if known)

#### B. Equipment Description

ΞY	Julpinent Description	
cor Be	te that per 310 CMR 7.02, MassDEP can issue a Plan Approval only for particular temissions that are representative of Best Available Control Tecst Available Control Technology (BACT) Emissions and the MassDEP BASTRUCTIONS for a link.	chnology (BACT). See Section D:
1.	Is this proposed project modifying previously approved equipment?	☐ Yes ☐ No
	If Yes, list pertinent Plan Approval(s):	
2.	Is this proposed project replacing previously approved equipment?	☐ Yes ☐ No
	If Yes, list pertinent Plan Approval(s):	
3.	Provide a description of the proposed project, including relevant param operating temperature and pressure) and associated air pollution control	
Net	tting & Offsets	
4.	Is netting being used to avoid 310 CMR 7.00: Appendix A?	☐ Yes* ☐ No – Skip to 5
	*If Yes, attach a description of contemporaneous increases and decreases in a nonattainment pollutant emissions over a period of the most recent five (5) cale proposed project will commence operating. For each emission unit, this descripemission unit, the year it commenced operation or was removed from service, approval(s), and its potential (or allowable) nonattainment pollutant emissions. "net out" of the requirement to submit a plan application and comply with Best Appursuant to 310 CMR 7.02.	ndar years, including the year that the otion must include: a description of the any associated MassDEP-issued Plan In any case, a proposed project canno
5.	Is the proposed project subject to 310 CMR 7.00: Appendix A Nonattainment Review?	☐ Yes* ☐ No – Skip to 6
	*If Yes, pursuant to 310 CMR 7.00: Appendix A(6), federally enforceable emissic Credits (ERCs), must be used for this part of the application. Complete Table 2 the facility providing the federally enforceable emission offsets, or what is being controlled at this facility to obtain the required emission offsets. Emission offsets enforceable Plan Approval to be used for offsetting emission increases in applicance.	on the next page to summarize either shut down, curtailed or further smust be part of a federally



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#### B. Equipment Description (continued)

Note: Complete this table if you answered Yes to Question 5. Otherwise, skip to Question 6.

d	Table 2					
Source of Emi- Reduction Cru (ERCs) or Emissions Off	edits	Transmittal No. of Plan Approval Verifying Generation of ERCs, if Any	Air Contaminant	Actual Baselines Emissions (Tons per Consecutive 12-Month Time Period) <sup>1</sup>	New Potential Emissions <sup>2</sup> (Tons per Consecutive 12-Month Time Period After Control)	ERC <sup>3</sup> or Emission Offsets, Including Offset Ratio & Required ERC Set Aside (Tons per Consecutive 12-Month Time Period)

Actual Baseline Emissions means the average actual emissions for the source of emission credits or offsets in the previous two years (310 CMR 7.00: Appendix A: Emission Offsets and Nonattainment Review).

<sup>2</sup>New Potential Emissions means the potential emissions for the source of emission credits or offsets after project completion (310 CMR 7.00: Appendix A: Emission Offsets and Nonattainment Review).

Complete the table(s) below to summarize the details of each Emission Unit being proposed.

Table 3A					
Facility-Assigned Identifying Number for Equipment (Emission Unit No.)	Description of Equipment Including Manufacturer & Model Number or Equivalent (e.g. Acme Coating Line, Model No. AB12)	Air Contaminant(s) Emitted	Potential Emissions, <sup>1</sup> Uncontrolled (Tons per Consecutive 12-Month Time Period)		
		$PM^2$			
☐ New		VOC			
☐ Modified		CO <sub>2</sub>			
		Total HAPs			
		Worst Case Individual HAP <sup>3</sup>			
		Other:			

<sup>1</sup> Potential emissions based on worst case raw material (e.g. coating) using maximum application rate and no air pollution control equipment. (See Section F. Record-Keeping Procedures.)

<sup>2</sup> PM includes particulate matter having a diameter of 10 microns or less (PM<sub>10</sub>) and particulate matter having a diameter of 2.5

<sup>&</sup>lt;sup>3</sup> Emission Reduction Credit (ERC) means the difference between Actual Baseline and New Potential Emissions, including an offset ratio of 1.26:1 (310 CMR 7.00: Appendix B(3)).

microns or less (PM<sub>2.5</sub>).

Calculate Worst Case Individual Hazardous Air Pollutant (HAP) potential emissions based on use of the raw material with the highest individual HAP content.



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Transmittal Number	
Facility ID (if known)	_

#### **B. Equipment Description** (continued)

	Table 3	В	
Facility-Assigned Identifying Number for Equipment (Emission Unit No.)	Description of Equipment Including Manufacturer & Model Number or Equivalent (e.g. Acme Coating Line, Model No. AB12)	Air Contaminant(s) Emitted	Potential Emissions, Uncontrolled (Tons per Consecutive 12-Month Time Period)
		PM	
☐ New		VOC	
☐ Modified		CO <sub>2</sub>	
		Total HAPs	
		Worst Case Individual HAP	
		Other:	

Note: If you are proposing more than three Emission Units, complete additional copies of these tables.

	Table 3	С	
Facility-Assigned Identifying Number for Equipment (Emission Unit No.)	Description of Equipment Including Manufacturer & Model Number or Equivalent (e.g. Acme Coating Line, Model No. AB12)	Air Contaminant(s) Emitted	Potential Emissions, Uncontrolled (Tons per Consecutive 12-Month Time Period)
		PM	
☐ New		VOC	
☐ Modified		CO <sub>2</sub>	
		Total HAPs	
		Worst Case Individual HAP	
		Other:	
7. Does your pro	posed project involve coating and/or p	orinting operation(s)?	s* □ No

7.	Does your proposed project involve coating and/or printing operation(s)?	☐ Yes* ☐ No
	*If Yes, complete and attach to this application Form BWP AQ Coatings & Inks.	
8.	Are you proposing an Air Pollution Control Device (PCD)?	☐ Yes* ☐ No
	*If Ves, complete Table 4 on the next page to summarize the details of each PCD hei	ng proposed



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Facility ID (if known)

#### **B. Equipment Description** (continued)

Note: If you are proposing one or more Air Pollution Control Devices (PCDs), you must also submit the applicable Supplemental Form(s). See Page 6 for additional information.

	Table 4A								
Facility-Assigned Identifying Number & Description of Air Pollution Control Device (PCD)	Emission Unit No. Served by PCD	Air Contaminant(s) Controlled	Capture Efficiency (CE), Percent by Weight (CE is Presumed to be 100% Based on Permanent Total Enclosure (PTE), 40 CFR 51 Appendix B Method 204)	Destruction Efficiency (DE) or Removal Efficiency (Percent by Weight)	Overall Control (Percent by Weight (CE*DE)/100)				
Facility I.D. No.		PM <sup>1</sup>							
Description		VOC							
☐ New ☐ Existing		Total HAPs							
		Individual HAP							
		Other:							

<sup>&</sup>lt;sup>1</sup> PM includes particulate matter having a diameter of 10 microns or less (PM<sub>10</sub>) and particulate matter having a diameter of 2.5 microns or less (PM<sub>2.5</sub>).

Note: If you are proposing more than two Air Pollution Control Devices (PCDs), complete additional copies of these tables.

	Table 4B								
Facility-Assigned Identifying Number & Description of Air Pollution Control Device (PCD)	Emission Unit No. Served by PCD	Air Contaminant(s) Controlled	Capture Efficiency (CE) (Percent by Weight; CE is Presumed to be 100% Based on Permanent Total Enclosure (PTE), 40 CFR 51 Appendix B Method 204)	Destruction Efficiency (DE) or Removal Efficiency (Percent by Weight)	Overall Control (Percent by Weight (CE*DE)/100)				
Facility I.D. No.		PM							
Description		VOC							
□New		Total HAPs							
☐ Existing		Individual HAP							
		Other:							



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Transmittal Number	
Facility ID (if known)	

#### B. Equipment Description (continued)

#### **Supplemental Forms Required**

If you are proposing one or more PCDs, you will also need to submit the applicable form(s) below.

If Your Project Includes:	You Must File Form(s):		
Wet or Dry Scrubbers	BWP AQ Scrubber		
Cyclone or Inertial Separators	BWP AQ Cyclone		
Fabric Filter	BWP AQ Baghouse/Filter		
Adsorbers	BWP AQ Adsorption Equipment		
Afterburners or Oxidizers	BWP AQ Afterburner/Oxidizer		
Electrostatic Precipitators	BWP AQ Electrostatic Precipitator		
Selective Catalytic Reduction	BWP AQ Selective Catalytic Reduction		
Sorbent/Reactant Injection	BWP AQ Sorbent/Reactant Injection		

Note: The installation of some process equipment can cause off-site noise if proper precautions are not taken. For additional guidance, see the MassDEP Noise Pollution Policy Interpretation.

Complete the table below to summarize all associated noise suppression equipment, if any is being
proposed, and attach a completed Form BWP AQ Sound to this application (unless MassDEP waives this
requirement).

Table 5								
Emission Unit No(s). Served by Noise Suppression Equipment	Type of Noise Suppression Equipment (e.g. Mufflers, Acoustical Enclosures)	Equipment Manufacturer	Equipment Model No.					



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Facility ID (if known)

В.	Eq	uipment Description (continued)	
	10.	Is there any external noise generating equipment associated with the proposed project?	☐ Yes ☐ No – Skip to 12
	11.	Have you attached a completed Form BWP AQ Sound to this application?	☐ Yes ☐ No*
		*If No, explain:	
	12.	Describe the potential for visible emissions from the proposed project and ho	w they will be controlled:
	13.	Describe the potential for odor impacts from the proposed project and how the	ey will be controlled:

#### C. Stack Description

Complete the table below to summarize the details of the proposed project's stack configuration.

Pollution Control Engineering Practice. When designing	Table 6							
stacks, special consideration must be given to nearby structures and terrain to prevent emissions	Emission Unit No.	Stack Height Above Ground (Feet)	Stack Height Above Roof (Feet)	Stack Exit Diameter or Dimensions (Feet)	Exhaust Gas Exit Temperature Range (Degrees Fahrenheit)	Exhaust Gas Exit Velocity Range (Feet per Second)	Stack Liner Material	
downwash and adverse impacts								
upon sensitive receptors. Stack must be vertical,								
must not impede vertical exhaust gas flow, and must be a								
minimum of 10 feet above rooftop or								
resh air intake, whichever is higher. For additional								

Note: Discharge must meet Good Air E W st be st to do ac up re m m ve flo m ab fre W Fo guidance, refer to the MassDEP "Stack Design General Guidelines." See the instructions for a link.



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Facility ID (if known)						

#### D. Best Available Control Technology (BACT) Emissions

1. Complete the table(s) below to summarize the proposed project's BACT emissions.

	Table 7A								
Emission Unit No.	Air Contaminant	Uncontrolled Emissions (Pounds per Hour [lbs/hr], Grains per Actual Cubic Foot [gr/acf], Grains per Dry Standard Cubic Foot [gr/dscf], or Parts per Million on a Dry Volume Corrected Basis [ppmvd@ %O2 or CO2])	Proposed BACT Emissions (lbs/hr, gr/acf, gr/dscf, or ppmvd@ %O2 or CO2)	Proposed Consecutive 12-Month Time Period Emissions, if Any (Tons)  (Enter "N/A" if not requesting a long-term emissions cap)	Proposed Monthly Time Period Emissions Restrictions¹ (Tons)  (Enter "N/A" if not requesting a monthly emissions cap)	Proposed Production or Operational Limits <sup>2</sup> (Enter "N/A" if not requesting a production or operational limit)			
	PM <sup>3</sup>								
	VOC								
	Total HAPs								
	Individual HAP								
	CO <sub>2</sub>								
	Other:								

<sup>&</sup>lt;sup>1</sup> Provide a monthly emission restriction if proposing a 12-month time period restriction.

of 2.5 microns or less (PM2.5).

<sup>&</sup>lt;sup>2</sup> Provide a definitive method to monitor and document compliance with any emission(s) limit(s) to be contained in a written MassDEP Approval. Production or operational limits are but one method that may be used. To foster pollution prevention, you may propose other methods, subject to approval by MassDEP.

<sup>3</sup> PM includes particulate matter having a diameter of 10 microns or less (PM<sub>10</sub>) and particulate matter having a diameter



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#### D. Best Available Control Technology (BACT) Emissions (continued)

	Table 7B								
Emission Unit No.	Air Contaminant	Uncontrolled Emissions (lbs/hr, gr/acf, gr/dscf, or ppmvd@ %O2 or CO2)	Proposed BACT Emissions (lbs/hr, gr/acf, gr/dscf, or ppmvd@ %O2 or CO2)	Proposed Consecutive 12-Month Time Period Emissions, if Any (Tons)	Proposed Monthly Time Period Emissions Restrictions (Tons)	Proposed Production or Operational Limits			
	PM								
	VOC								
	Total HAPs								
	Individual HAP								
	CO <sub>2</sub>								
	Other:								

Note: If you are proposing more than three Emission Units, complete additional copies of these tables.

	Table 7C					
Emission Unit No.	Air Contaminant	Uncontrolled Emissions (lbs/hr, gr/acf, gr/dscf, or ppmvd@ %O2 or CO2)	Proposed BACT Emissions (lbs/hr, gr/acf, gr/dscf, or ppmvd@ %O2 or CO2)	Proposed Consecutive 12-Month Time Period Emissions, if Any (Tons)	Proposed Monthly Time Period Emissions Restrictions (Tons)	Proposed Production or Operational Limits
	РМ					
	VOC					
	Total HAPs					
	Individual HAP					
	CO <sub>2</sub>					
	Other:					



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Note: Top-Case BACT is the emission rate identified via the MassDEP BACT Guidance or a preapplication meeting with MassDEP.

D. Best Available Control Technology (BACT) Emissions (con	ntinued)
<ol><li>Are proposed BACT emission limits in the previous table(s) Top-Case BACT as referenced in 310 CMR 7.02(8)(a)2.a?</li></ol>	☐ Yes ☐ No
<ol><li>Are proposed BACT emission limits established using the approach defined in 310 CMR 7.02(8)(a)2.b?</li></ol>	☐ Yes ☐ No
If you answered <b>Yes</b> to Question 3, provide details below:	
If you answered <b>No</b> to both questions above, you must attach to this application AQ BACT to demonstrate that this project meets BACT as provided in 310 CN 7.02(8)(a)2.c.	•

#### **E. Monitoring Procedures**

Complete the table below to summarize the details of the proposed project's monitoring procedures.

	Table 8		
Emission Unit No.	Type or Method of Monitoring (e.g. CEMS <sup>1</sup> , Flow Meter)	Parameter/Emission Monitored	Frequency of Monitoring

<sup>&</sup>lt;sup>1</sup> CEMS = Continuous Emissions Monitoring System



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Facility ID (if known)		

#### F. Record Keeping Procedures

Complete the table below to summarize the details of the proposed project's record keeping procedures. Proposed record keeping procedures need to be able to demonstrate your compliance status with regard to all limitations/restrictions proposed herein. Record keeping may include, but is not limited to, hourly or daily logs, meter charts, time logs, purchase records, raw material records, and CEMS records.

Table 9				
Emission Unit No.	Parameter/Emission (e.g. Temperature, Material Usage, Air Contaminant)	Record Keeping Procedures (e.g. Data Logger or Manual)	Frequency of Data Record (e.g. Hourly, Daily)	

Examples of emissions calculations for record keeping purposes:

- Worst case coating/ink/other contains 5.5 pounds of VOC per gallon of coating
- Process application rate = 3.0 gallons of coating/ink/other applied per hour
- Process operates 1,800 hours per consecutive 12-month time period

3.0 gallons per hour X 5.5 lbs of **VOC** per gallon X 1,800 hours per consecutive 12-month time period X 1 ton per 2,000 pounds = 14.8 tons of **VOC** per consecutive 12-month time period

#### -or-

- Worst case coating/ink/other contains 5.5 pounds of **VOC** per gallon of coating
- Process utilized 5,678 gallons of coating per consecutive 12-month time period

5,678 gallons per consecutive 12-month time period X 5.5 pounds **VOC** per gallon X 1 ton per 2,000 pounds = 15.6 tons of **VOC** per consecutive 12-month time period



# **Massachusetts Department of Environmental Protection**Bureau of Waste Prevention – Air Quality

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Comprehensive Plan Application for Process Emission Unit(s)
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G	Additional Information Checklist				
lote: For guidance nd specific Top-Case BACT requirements,	Attach a specific facility description and the following required additional information that MassDEP needs to process your application. Check the box next to each item to ensure that your application is complete.				
ee the instructions.	☐ Plot Plan				
	Equipment Manufacturer Specifications, including but not limited to Material Safety Data Sheets, Technical Data Composition Sheets, etc.  Equipment Standard Operating Procedures  Equipment Standard Maintenance Procedures, Including Cleaning Method & Frequency  Calculations to Support This Plan Application  Air pollution control device manufacturer specifications, if applicable  Air pollution control device standard operating procedures, if applicable  Air pollution control device standard maintenance procedures, if applicable				
	Process flow diagram				
	BWP AQ BACT Form, if not proposing Top-Case BACT				
	Process flow diagram for the proposed equipment and any PCD, if applicable, including relevant parameters (e.g. flow rate, pressure and temperature)				
	Note: Pursuant to 310 CMR 7.02(5)(c), MassDEP may request additional information.				
H.	Other Regulatory Considerations				
	Indicate below whether the proposed project is subject to any additional regulatory requirements.				
	310 CMR 7.00: Appendix A Nonattainment Review, or is netting used to avoid review ☐ Yes ☐ No under 310 CMR 7.00 Appendix A or 40 CFR 52.21?				
	40 CFR 60: New Source Performance Standards (NSPS)? ☐ Yes ☐ No				
	If Yes: Which subpart? Applicable emission limitation(s):				
	40 CFR 61: National Emission Standards for Hazardous Air Pollutants (NESHAPS) ☐ Yes ☐ No				



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5. 27. ID (71)
Facility ID (if known)

	If Yes:	Which subpart?	Applicable emission limitation(	s):	
Н.	Other Re	gulatory Consideration	s (continued)		
	40 CFR 63: Generally Av	NESHAPS for Source Categorie vailable (GACT) Control Technol	s – Maximum Achievable (MACT) ogy	or Yes No	
	If Yes:	Which subpart?	Applicable emission limitation(	s):	
	301 CMR 11	.00: Massachusetts Environmer	ntal Policy Act (MEPA)?	☐ Yes ☐ No	
	If Yes:	EOEA No.:			
	Other Applic	able Requirements?		☐ Yes ☐ No	
	If Yes:	Specify:			
	Facility-Wide Potential-to-Emit Hazardous Air Pollutants (HAPS): ☐ Major* ☐ Non-Major				
	*A Major source has a facility-wide potential-to-emit of 25 tons per year or more of the sum of all hazardous air pollutants or 10 tons per year or more of any individual hazardous air pollutant.				
I. Professional Engineer's Stamp  The seal or stamp and signature of a Massachusetts Registered Professional Engineer (P.E.) must be entered below. Both the seal or stamp impression and the P.E. signature must be original. This is to certify that the information contained in this form has been checked for accuracy, and that the design represents good air pollution control engineering practice.					
	P.E. Name (Type or Print)				
	P.E. Signature				
	Position/Title		Place P.E.	Seal or Stamp Here.	
	Company				
	Date (MM/DD/YYYY)				
	D.E. Number				

Continue to Certification by Responsible Official ▶



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#### J. Certification by Responsible Official

The signature below provides the affirmative demonstration pursuant to 310 CMR 7.02(5)(c)8 that any facility(ies) in Massachusetts, owned or operated by the proponent for this project (or by an entity controlling, controlled by or under common control with such proponent) that is subject to 310 CMR 7.00, et seq., is in compliance with, or on a MassDEP approved compliance schedule to meet, all provisions of 310 CMR 7.00, et seq., and any plan approval, order, notice of noncompliance or permit issued thereunder. This Form must be signed by a Responsible Official working at the location of the proposed new or modified facility. Even if an agent has been designated to fill out this Form, the Responsible Official must sign it. (Refer to the definition given in 310 CMR 7.00.)

I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.

Responsible Official Name (Type or Print)	
Responsible Official Signature	This Space Reserved for
Responsible Official Title	MassDEP Approval Stamp.
Responsible Official Company/Organization Name	
Date (MM/DD/YYYY)	

Continue to Energy Efficiency Evaluation Survey ▶



# **Massachusetts Department of Environmental Protection** Bureau of Waste Prevention – Air Quality

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Fo

Transmittal Number						
Facility ID (if known)						

Consecutive 12-Month Time Period.							
K.	K. Energy Efficiency Evaluation Survey						
	1.		you know where your enpressed air is being us	electricity and/or fuel and/or sed/consumed?	r water and/or heat and/or	☐ Yes ☐ No	
	2.	Has in tl	s your facility had an er he past two years? <sup>1</sup>	nergy audit performed by your utility supplier (or other)		☐ Yes ☐ No	
		a.	Did the audit include e requirements and com	valuations for heat loss, lig pressor usage?	hting load, cooling	☐ Yes ☐ No	
		b.	Did the audit influence	how this project is configu	red?	☐ Yes ☐ No	
	3.	Doe	es your facility have an	energy management plan?		☐ Yes ☐ No	
		a.	Have you identified a	nd prioritized energy conse	ervation opportunities?	☐ Yes ☐ No	
		b.		pportunities to improve ope ying an energy manageme		☐ Yes ☐ No	
<ul> <li>4. Has each emission unit proposed herein been including average and peak electrical use; effi suitability of alternative motors such as variable added cooling load as a result of the operation energy load due to building air exchange requirement or emissions to the ambient air; and/or use.</li> <li>5. Has your facility considered alternative energy or wind power as a means of supplementing a demand?</li> </ul>				Ik electrical use; efficiency otors such as variable spee esult of the operation of the g air exchange requiremen	of electric motors and d; added heat load and/or proposed process; added ts as a result of exhausting	☐ Yes ☐ No	
						I □ Yes □ No	
	6.	Doe (LE	es your facility comply v ED) Green Building Ra	vith Leadership in Energy & ting System design recomi	& Environmental Design mendations? <sup>2</sup>	☐ Yes ☐ No	
<sup>1</sup> A facility wide energy audit would include an inspection of such things as lighting, air-conditioning, heating and other energy-demand equipment. It would also provide you with information on qualifying equipment incentive programs; analysis of your energy consumption patterns and written cost-savings recommendates estimated cost savings for installing new, high-efficiency equipment.						quipment rebates and	
	<sup>2</sup> To understand the LEED Rating System, it is important to become familiar with its comprising facets. To be considered for LEED New Construction and Major Renovations, a building must meet specific prerequisites and additional credit areas within six categories:						
	• Sı	ustair	nable Sites	Materials and Resources	Water Efficiency		

• Energy and Atmosphere

• Indoor Environmental Quality

• Innovation and Design